

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NEWPORT NEWS DIVISION**

DAVID D. DENTON,

Plaintiff,

v.

JPMORGAN CHASE & CO. *et al.*,

Defendants.

Civil Case No. 4:19-cv-00114-MSD-DEM

**DECLARATION OF COLLEEN SMITH IN SUPPORT OF
DEFENDANTS JPMORGAN CHASE & CO. AND JPMORGAN CHASE BANK, N.A.'S
OPPOSITION TO PLAINTIFF'S MOTION TO DENY OR CONTINUE CHASE'S
MOTION FOR SUMMARY JUDGMENT PURSUANT TO FED. R. CIV. P. 56(D)**

I, Colleen Smith, declare as follows:

1. I am an associate at the law firm Covington & Burling LLP. I represent Defendants JPMorgan Chase & Co. and JPMorgan Chase Bank, N.A. ("Chase") in the above captioned case. I make this declaration based on my own knowledge. I am competent to testify about the matters stated herein, and if called to do so I would testify freely and competently thereto.

2. Attached hereto as Exhibit 1 is a true and correct copy of Plaintiff's First Request for Production of Documents to JPMorgan Chase & Co., and Chase Bank USA, N.A. I received this document via email from Plaintiff's counsel, Susan Rotkis, on Friday, February 7, 2020.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on February 14, 2020 in Washington, DC.

/s/ Colleen Smith
Colleen Smith